

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY, ALEXANDER
LEOGUERRA, MICHAEL MAERLENDER, BRANDON
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY
TATIANA WEAVER, and CAMERON WILLIAMS,
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF
TECHNOLOGY, UNIVERSITY OF CHICAGO, THE
TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY
OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES
OF DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN UNIVERSITY,
THE JOHNS HOPKINS UNIVERSITY,
MASSACHUSETTS INSTITUTE OF TECHNOLOGY,
NORTHWESTERN UNIVERSITY, UNIVERSITY OF
NOTRE DAME DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH
RICE UNIVERSITY, VANDERBILT UNIVERSITY, and
YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125-MFK

Judge Matthew F. Kennelly

**DECLARATION OF TAYLOR ADESSA OF ANGEION GROUP LLC
RE: DENIED CLAIMS AND APPEALS**

I, Taylor Adessa, hereby declare the following pursuant to 28 U.S.C. §1746:

1. I am a Project Manager with Angeion Group, LLC (“Angeion”), located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this Action. I am fully familiar with the facts contained herein based upon my personal knowledge, as well as information that has been provided to me by my colleagues in the ordinary course of business at Angeion.

2. The purpose of this declaration is to inform the Parties and the Court regarding the claims approval process for the Settlements with Brown University, the University of Chicago, Columbia University, Dartmouth College, Duke University, Emory University, Northwestern University, Rice University, Vanderbilt University, and Yale University.

CLAIM FORMS

Overview

3. As of September 5, 2025, Angeion has received and processed 78,019 Claim Forms. Each claim required supporting documentation confirming Class membership, and each claim was manually reviewed for eligibility to reduce the risk of fraud. Approximately 3,876 of the submitted Claim Forms were determined to be deficient for at least one of the following reasons: (1) the claim did not include supporting documentation, or the documentation provided was incomplete, illegible, corrupted, or not relevant to the criteria required for eligibility, (2) the documentation submitted did not verify that the claimant attended an eligible Defendant University, (3) the documentation submitted did not verify that the claimant attended an eligible Defendant University during an applicable Class Period, (4) the documentation submitted did not match or validate the name listed on the Claim Form, (5) the documentation submitted did not verify that the claimant (or family) personally contributed to the cost of tuition, fees, room, or board, (6) the claimant indicated on their Claim Form that all of their tuition, fees, room, and board expenses were fully covered by grants and/or scholarships, (7) the claimant indicated on their Claim Form that they did not receive need-based grants or scholarships, or (8) the claimant indicated on their Claim Form that they were not a U.S. citizen or permanent resident during the terms they attended a Defendant University.

Deficiency Process

4. On May 27, 2025, Angeion issued 3,876 deficiency notices by email or mail. Each notice provided claimants with thirty days to cure the identified deficiency(ies). Claimants were instructed to submit their responses by email or mail with the required information or documentation. The

deficiency notice further advised that failure to respond by June 26, 2025 would result in denial of the claim.

5. For email notification campaigns, Angeion has developed a proprietary system that leverages AWS Simple Email Service (SES) with Amazon Simple Notification Service (SNS) to track email delivery, opens, and clicks with high accuracy. SES provides real-time event notifications for deliveries, bounces, and complaints, while open and click tracking is enabled through unique tracking pixels and link redirections. While some spam filters can spoof opens and clicks, Angeion has found SES to be much more reliable in reporting real human interaction than similar services in the market. This system, backed by AWS's secure and industry-standard infrastructure, ensures data integrity and reliability. Angeion has never experienced significant issues with trackability, and reporting is based on verifiable data directly from AWS, making email engagement statistics both accurate and legally defensible.

6. Angeion employs industry best practices to maximize the deliverability of email notifications and reduce the possibility that Court-Ordered notifications are blocked, flagged as spam, or otherwise handled in a manner that reduces the likelihood of delivery. Regardless of best efforts made and best practices followed, invariably some percentage of emails will be incorrectly flagged as spam by the recipient's ISP. This is true in virtually every mass email campaign, whether in the class action or marketing context, as individual email recipients (or their email administrator) control the security settings via their ISP or email client. These are the settings that influence what is and what is not categorized as spam by the receiving entity irrespective of the actual authenticity of the email communication or best efforts taken to avoid spam filters.

7. Of the 3,876 deficiency notices issued, 3,853 were sent to the email address provided on the applicable claim form and 23 were mailed via United States Postal Service ("USPS") to the mailing address provided on the claim form due to missing or insufficient email address information. Of the 3,853 emailed notices sent, 24 were returned as undeliverable (soft or hard bounces), and 3,829 were successfully delivered. On June 17, 2025, Angeion mailed deficiency

notices via USPS to the 24 claimants whose deficiency notices could not be delivered via email. As of September 12, 2025, none of the mailed deficiency notices have been returned to Angeion as undeliverable.

Deficiency Responses

8. As of September 12, 2025, Angeion has received 806 responses to the deficiency notices. Of these, 803 successfully cured the noted deficiency(ies) and the corresponding claims were updated to an approved status, while three (3) did not cure the deficiency(ies) and those claims were ultimately rejected. A total of 3,030 claimants did not respond to their deficiency notice, and their claims were therefore rejected. There were 29 claims in the deficient population that were later identified as duplicates and rejected. Lastly, as part of its quality assurance procedures, Angeion conducted a re-review of certain claim populations and identified 11 claims which were associated with a previously denied duplicate submission that contained sufficient supporting documentation to cure the original claim's deficiencies, thus these 11 claims were updated to an approved status. Following the completion of the deficiency review process, there were 72,624 approved claims.

Rejection Notices & Appeals

9. In accordance with the Allocation Plan Process (ECF 703-3), on August 27, 2025, Angeion sent rejection letters to all claimants who either failed to cure their deficiency(ies) or failed to respond to their deficiency notices. The rejection letters included instructions for submitting an appeal to the Court by mailing their appeal with a postmark date not later than September 18, 2025.

10. Following distribution of the rejection letters, Angeion was contacted by several claimants contesting their rejection. Angeion also received forwarded contestations submitted directly to Settlement Class Counsel or were made of aware of contestations that were filed with the Court. A second-level review of these escalations revealed a systemic error in the processing of certain claims that included Latin diplomas as proof of Class membership. As a result, approximately 345

claimants who had submitted valid, timely claims with sufficient supporting documentation were inadvertently flagged as deficient and later rejected.

11. At the direction of Settlement Class Counsel, Angeion is currently conducting a comprehensive secondary review of claims that were rejected for deficient documentation. If any rejected claim is determined to have been timely and the documentation is valid, the rejection will be reversed. This review will ensure that claimants who did not appeal, or chose not to appeal, are not unfairly prejudiced.

12. As of September 12, 2025, Angeion has been notified of 59 docketed appeals submitted in response to the rejection notices. Of these, 48 claim denials have been overturned following additional review, 11 have been upheld. Among the denials, one involved a claim deemed ineligible because it related to an academic semester outside of the class period and one involved a claim determined to be fraudulent or submitted by someone other than the noticed class member. Angeion confirmed that 10 claims with upheld denials received a deficiency notice via email on May 27, 2025.¹ A list of docketed appeals and Angeion's determinations is attached as **Exhibit A**.

13. As of September 12, 2025, following a secondary review, Angeion determined that 1,619 denied claims without a docketed appeal contained acceptable supporting documentation within the initial submissions. Consequently, the denials for these claims were reversed. Claimants who contacted Angeion directly and had their claim denial overturned have been notified of the reversal. Angeion will notify all remaining claimants with overturned denials.

14. As of September 12, 2025, following the secondary review, Angeion has upheld the denial of 497 claims.

CONCLUSION

15. As of September 12, 2025, 74,287 claims are approved claims, 3,671 claims are denied and 61 were withdrawn. The final totals of approved and denied claims remain pending, subject to the

¹ The claim deemed ineligible for relating to an academic term outside the class period was not issued a deficiency notice, as the defect was incurable. Instead, a rejection notice was sent with instructions on how to appeal the determination.

outcome of Angeion's ongoing secondary review of previously rejected claims. Angeion will continue to keep Settlement Class Counsel informed of the outcome of the review.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: September 15, 2025


TAYLOR ADESSA